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11 **UNITED STATES DISTRICT COURT**
12 **DISTRICT OF NEVADA**

13 UNITED STATES OF AMERICA,
14 Plaintiff,
15 vs.
16 FREDERICK THOMAS,
17 Defendant.

CASE NO.: 2:17-CR-00306-JCM-PAL

**FREDERICK THOMAS' UNOPPOSED
MOTION TO MODIFY THE
CONDITIONS OF PRE-TRIAL
RELEASE**

18 **CERTIFICATION:** This motion is timely filed.

19 COMES NOW Defendant, Frederick Thomas, by and through his counsel, Maysoun
20 Fletcher, and hereby requests permission to open one checking and one savings account.

21 Dated this 8th day of April, 2019.

22 Respectfully submitted,

23 //s// Maysoun Fletcher Esq.
24 Attorney for Frederick Thomas
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1 On April 13, 2018, Mr. Thomas' detention hearing was held and he was released on a
2 personal recognizance bond with conditions. (ECF 383) One of the conditions prevented Mr.
3 Thomas from opening any new financial accounts. (ECF 383, No. 74) Mr. Thomas is currently
4 employed and making great strides to reacclimate as a productive member of society, after being
5 in BOP custody for nearly 5 years on the sister case, *U.S. v. Zoloterev*, 2:12-cr-00004,
6 to the current matter. He is currently at a residential re-entry center in Orlando, Florida, is
7 gainfully employed, and has earned permission to go home to visit his children and girlfriend,
8 the mother of his children, on the weekends.

10 At this time, Mr. Thomas has no bank accounts and he requests permission to open one
11 checking and one savings account to allow him to function in the world by depositing his
12 earnings into a bank account, placing a portion of his earnings in a savings account, and writing
13 checks for his debts and obligations. Counsel for Mr. Thomas reached out to Government
14 Counsel, Chad McHenry, who has no opposition to this request with the provision that pre-trial
15 services have access to the transactions on the accounts and that he is not to apply for or open
16 any other financial accounts of any kind.

19 Without any bank account, Mr. Thomas is currently forced to cash his pay checks,
20 provide proof that he has the money to the residential re-entry center, obtain cashier checks or
21 money orders for everything he has to pay, including, but not limited to, restitution for the prior
22 case referenced above, child support, and all other debts he must pay. He is also unable to place
23 any of his earnings in a savings account, instead having to keep them as cash on hand.

25 For these reasons, Mr. Thomas respectfully requests that his conditions of release be
26 slightly modified to permit him to open one checking and one savings account at a bank with
27 pretrial services having the ability to monitor the transactions on the account.

1 **ORDER**

2 **IT IS SO ORDERED** that Frederick Thomas' Unopposed Motion To Modify The
3 Conditions of Pre-Trial Release is GRANTED. Mr. Thomas shall be permitted to open one
4 checking and one savings account at a financial institution and Pre-trial services shall have the
5 ability to monitor the transactions on the accounts.
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7 Dated this 11 day of April, 2019.

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11 **U.S. MAGISTRATE JUDGE**
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/s/ Maysoun Fletcher
Maysoun Fletcher, an Employee of
The Fletcher Firm, P.C.